



May 20, 2024

VIA ECF

The Honorable Nicholas G. Garaufis
United States District Judge
U.S. District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Chang, Case No. 18-CR-681

Dear Judge Garaufis:

The defendant, Manuel Chang, respectfully submits this letter to propose an amended pretrial schedule in the above-referenced case. The amendments to the prior scheduling order are respectfully requested in light of the trial date changing from July 29, 2024 to July 15, 2024. The parties have conferred and have agreed to the following proposed deadlines to be in effect, absent leave from this Court.

May 29, 2024: Defendant to produce case-in-chief expert disclosures to the Government

May 31, 2024: Parties to file motions *in limine*

June 10, 2024: Parties to file responses to motions *in limine*

June 17, 2024: Parties to file replies to motions *in limine*

July 3, 2024: Parties to exchange 3500 and 26.2 material

July 5, 2024: Parties to exchange exhibits and exhibit lists and to submit witness lists, proposed *voir dire*, proposed jury charges, proposed verdict sheet, and a list of individuals and entities the parties anticipate will be mentioned at trial

Respectfully submitted,

s/ Jamie H. Solano
Adam C. Ford
Jamie Hoxie Solano
Anjula S. Prasad

Counsel for Manuel Chang

So Ordered.

s/Nicholas G. Garaufis
Hon. Nicholas G. Garaufis
Date: *5/20/24*

Cc: All Counsel of Record (via ECF)